

February 20, 2004

## **Corrective Action Objectives and Goals The Dow Chemical Company**

Michigan law is designed to prevent hazardous waste from threatening public health or harming the environment. The Department of Environmental Quality (DEQ), Waste and Hazardous Materials Division (WHMD), is charged with enforcing that law and will ensure that hazardous waste at The Dow Chemical Company (Dow) facility is managed to protect human health and the environment. The WHMD will also require Dow to respond and remove threats to human health and the environment caused by the past release of contamination both on the Dow facility and beyond Dow property. The process by which this will occur is known as "corrective action." The purpose of corrective action is to reduce contaminants to an amount that protects against adverse environmental and health effects. For example, the public health protection standard for dioxin in soil is 90 parts per trillion (ppt).

Both Dow's current hazardous waste activities and what it must do for corrective action are directed by the Hazardous Waste Facility Operating License issued to Dow on June 12, 2003.

Corrective action, both on-site and off-site, occurs in steps. The mandatory steps are:

- Collecting information on where contamination is present (sampling and investigation called the Remedial Investigation);
- Evaluating that information and prioritizing subsequent steps based on those findings;
- Identifying the various ways that contamination could be removed or controlled in order to protect human health and the environment (called the Feasibility Study);
- Selecting the actions that provide the most practical and cost effective way to protect human health and the environment;
- Undertaking those actions (called the Remedial Actions); and
- Ensuring the work done has achieved its goals (called Long-term Maintenance and Monitoring).

These steps can be taken separately at different locations. As a result, different steps are underway at a number of locations as Dow does what is necessary to address contamination caused by its operations. Steps (called Interim Response Activities) are occurring now at locations presenting the most immediate threats. The corrective action work will be prioritized to address the most significant human health and environmental issues first.

Community participation is crucial to the corrective action process. DEQ public involvement efforts are designed to educate, inform, and provide opportunities for participation in the decision-making process regarding the site investigation and cleanup process.

This is one of the most challenging environmental matters in our state. The size of the areas of contamination and the nature of the contaminants contribute to the complexity of the corrective action process, a process that will take a number of years to complete.

Independent from the corrective action activities overseen by the DEQ, there are programs in other agencies in which the primary focus is on public health monitoring and intervention. These programs identify where unacceptable exposures or health impacts have occurred, or are likely to have occurred, and take action to limit or halt exposures. Examples of agencies with programs that take such actions are the Department of Community Health, the United States Centers for Disease Control and Prevention, and its Agency for Toxic Substances and Disease Registry. Intervention programs may only take action if impacts have already occurred or are likely to have

February 20, 2004

already occurred. Intervention levels, unlike protection standards, may be set at concentrations at which adverse health effects are known to occur.